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ATTORNEYS-AT-LAW

July 2, 2024

Via ECF

Honorable Louis A. Scarcella
U.S. Bankruptcy Court, Eastern District of N.Y.
Alfonse M. D'Amato U.S. Courthouse
290 Federal Plaza
Central Islip, NY 11722

**Re: In re Benjamin O. Ringel (the “Debtor”)
Case No. 24-71468 (LAS)
Request for Adjournment**

Dear Judge Scarcella:

Our office serves as counsel to the Debtor in the above chapter 7 proceeding.

Our office writes to seek an adjournment of Atalaya Asset Income Fund II LP's (“Atalaya”) motion seeking confirmation that the automatic stay does not apply, or in the alternative, for modification of the automatic stay (“Stay Relief Motion”) (Dkt 24). The Stay Relief Motion is scheduled to be heard on July 9, 2024, at 10:00 a.m. Yesterday, on July 1, 2024, the Debtor filed a motion seeking to convert this case to a case under chapter 11 (Dkt 37). The motion to convert has been scheduled for August 8, 2024, at 10:00 a.m. (Dkt 39).

The Debtor seeks that the Stay Relief Motion be adjourned to August 8, 2024, which is the same date that the Debtor's motion to convert is scheduled to be heard. This is the first adjournment request by the Debtor for the Stay Relief Motion. The reason for the adjournment request is two-fold: (i) to provide the Debtor with additional time to prepare opposition to the Stay Relief Motion; and (ii) because the motion to convert and Stay Relief Motion may have overlapping issues of law and fact that are better addressed simultaneously. We requested consent to the adjournment from Atalaya's counsel but they refused.

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Thank you for Your Honor's attention to this matter, and please feel free to contact our office with any questions or concerns.

Best Regards,

THE FRANK LAW FIRM P.C.

/s/Thomas J. Frank

Thomas J. Frank

For the Firm

cc: All appearing parties (via ECF)